I strongly support the permanent assignment of 800-SUICIDE to SAMHSA. Our organization is one of 140 crisis lines in the national Lifeline network. We answer 1-800-273-TALK & 1-800 SUICIDE calls originating from Marin County, California. We were very thankful when SAMHSA paid the Kristen Brooks Hope Center's over-due phone bill and accepted responsibility for 1-800 SUICDE starting in the summer of 2006, when the Kristen Brooks Hope Center was no longer able to support it. SAMHSA chose an excellent non-profit to administer the Lifeline Network of hotlines.

It has been four years. KBHC has not kept in touch with our organization. They have played no part in the operation of a 1-800 SUICIDE network. There is no agreement between our center and KBHC to take calls routed by them to us from 1-800 SUICIDE or from any of their other numbers.

SAMHSA argues, and we agree, that: "the hotlines are a crucial public health resource and that reversion to the Kristen Brooks Hope Center risked another public safety emergency, given The Kristen Brooks Hope Center's financial instability."

Financial instability is only part of the picture: network stability, responsiveness & support are just as important. Our organization saw KBHC's network support crumble and its phone system fail in 2006 until SAMHSA stepped in. The Kristen Brooks Hope Center states that: "The Center's goal is to operate and publicize these hotlines; it does not run the counseling centers or train the counselors." But SAMHSA, in contrast, has chosen a non-profit with very high standards and a great deal of experience managing a hotline system. Since 2007, when SAMHSA took responsibility for 1-800 SUICIDE, calls have been received without the problems associated with KBHC. We have little faith that KBHC will attend to network management responsibly. In addition, and equally important, we have received excellent clinical training from the Lifeline's staff of IT and healthcare professionals. KBHC simply asserts their network role is to provide call routing and publicity.

Since 2006 we have been disheartened and discouraged to see KBHC blight their suicide prevention effort by beginning a grotesque campaign of misinformation to discourage suicidal callers from using either 1-800 number. Statements on the KBHC website claimed the government intended to violate callers' confidentiality. Reese Butler to the Washington Post 8/18/06 said: "If they don't need to have the data, then why do they need to own the hotline?" Butler asked. "The only justification for owning the hotline is that they get access to the data." And in a press release: "I created this hotline in honor and memory of my wife and wanted it to have the utmost in integrity to the caller and to their family. It is unfair that SAMHSA is simply not paying the bills from 2004. They punish not only me for not giving them access to the data — but the calls that need help, will not get answered." Numerous interviews suggested legitimate claims for reimbursement were disallowed by SAMHSA and were outstanding. From the TWLOHA blog of 7/15/08 (2 years after the SAMHSA began paying the phone bill): "As a result of the many calls that 1-800-SUICIDE receives every day, and because of a delay in government funding, Hopeline is struggling to pay their phone bill. If this bill is not paid, the government will be allowed to fully take control of 1-800-SUICIDE. Part of what makes Hopeline such a powerful resource is that the calls placed to this number are completely private and confidential." The truth, now and at that time, is that with the national Lifeline administration, even more confidentiality was enforced, with many of the same crisis lines answering 1-800 SUICIDE calls.

At the same time, KBHC has continuously claimed responsibility for 1-800-SUICIDE and continued fundraising for it. In fact, the original Hopeline network to answer 1-800 SUICIDE no longer existed by January of 2007.

KBHC continues to claim responsibility for the management of 1-800 SUICIDE. Its current Guidestar statement: "The Kristin Brooks Hope Center is a public benefit corporation that administers the National Hopeline Network 1-800-SUICIDE (the Network)." But KBHC has had nothing to do with managing the 1-800 number for years. There is no working "Hopeline Network." SAMHSA has been the responsible party in every way. Please, no going back.

I disagree with KBHC that the "FCC's decision was arbitrary and capricious" but welcome it as "the product of reasoned decision making."

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